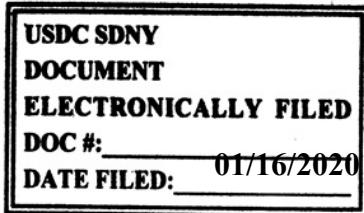


MEMO ENDORSED

Tilton Beldner LLP

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Via ECF

Hon. Judge Katherine H. Parker
U.S. District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Carlos Hernandez v. Tamrak Management, Inc.
Index No. 19-CV-6825 (PAE) (KHP)

Dear Hon. Judge Parker:

This firm was just retained to represent Defendant Tamrak Management, Inc., in the above referenced matter. I am writing to respectfully request that the deadline for submission of Defendant's Answer be extended until February 15, 2020. Should the court grant our request regarding Defendant's Answer, we further request that the Initial Pretrial Conference be adjourned to a date after February 15, 2020. The Initial Pretrial Conference is currently scheduled for January 21, 2020.

The reason for these requests is that we were just retained to handle this matter today, and we need some time to gather information, speak to relevant witnesses, and review relevant documents. I have spoken to Gregory Filosa, Esq., counsel for Plaintiff, and he consents to these requests. This is Defendant's first request for an extension of its deadline to submit an Answer, and its first request for an adjournment of the Initial Pretrial Conference. Should the court grant Defendant's requests, no other future deadlines would be affected.

Thank you for your time and consideration regarding this matter.

Very truly yours,

/S/
Joshua Beldner

CC: VIA ECF
Counsel for all parties